

AARON D. FORD  
Attorney General  
SCOTT H. HUSBANDS  
Nevada Bar No. 11398  
State of Nevada  
Office of the Attorney General  
5420 Kietzke Lane, Suite 202  
Reno, NV 89511  
(775) 687-2142 (phone)  
(775) 688-1822 (fax)  
Email: [shusbands@ag.nv.gov](mailto:shusbands@ag.nv.gov)  
*Attorneys for Defendant*  
*State of Nevada Department of*  
*Taxation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## JOHN P. EVPAK, an Individual

## Plaintiffs,

V.

**STATE OF NEVADA DEPARTMENT OF  
TAXATION, a political subdivision of the  
State of Nevada,**

Defendant.

Case No. 3:22-cv-00073-MMD-CLB

**STIPULATION, REQUEST, AND  
ORDER EXTENDING TIME TO  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT**

**(THIRD REQUEST)**

Defendant STATE OF NEVADA *ex rel.* its DEPARTMENT OF TAXATION (“Defendant” or “Taxation”) by and through its attorneys, AARON D. FORD, Attorney General for the State of Nevada, SCOTT H. HUSBANDS, Deputy Attorney General, pursuant to LR IA 6-1, LR IA 6-2, hereby submit their Stipulation, Request, and Order Extending Time to Answer or Otherwise Respond to Plaintiff’s Complaint. This is the third request for an extension of time to file an answer or otherwise respond to Plaintiff’s Complaint.

Plaintiff JOHN P. EVPAK (“Plaintiff” or “Mr. Evpak”), filed a Complaint (ECF No. 1) on February 7, 2022. Defendants were served the Complaint on February 16, 2022. The deadline for Defendants to answer or otherwise respond to the Complaint was March 8, 2022. Counsel met and conferred and agreed to extend that deadline to April 15, 2022. The Court

1 approved that stipulation and entered an order approving the stipulation. (ECF No. 7). At  
2 Taxation's request, the parties sought a second extension for that deadline for the reasons set  
3 forth in that stipulation. (ECF No. 8). The Court approved that agreement. (ECF No. 9). The  
4 parties now seek an additional short extension of one week to accommodate several unexpected  
5 client emergencies on the part of defense counsel. Additionally, Taxation will be adding a  
6 second Deputy Attorney General to assist with this matter and some additional time is needed  
7 for that attorney to help with preparing Taxation's responsive pleading. Counsel met and  
8 conferred electronically on Friday May 6, 2022 and are in agreement to extend the deadline for  
9 Taxation's responsive pleading to Friday, May 13, 2022.

10 Upon agreement by and between all the parties, through their respective counsel, the  
11 undersigned counsel request that this Court grant Defendant an extension of time, up to and  
12 including, May 13, 2022, to file an answer or otherwise respond by motion to Plaintiff's  
13 Complaint.

14       ///

15       ///

16       ///

17       ///

18       ///

19       ///

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27

28

1 By entering into this stipulation, none of the parties waive any rights they have under  
2 statute, law, or rule with respect to Plaintiff's Complaint.

3 DATED: May 6, 2022  
4

5 AARON D. FORD  
6 Attorney General

7 By: /s/ Scott H. Husbands

8 SCOTT H. HUSBANDS  
9 Deputy Attorney General  
Nevada Bar No. 11398  
10 Office of the Attorney General  
5420 Kietzke Lane, Suite 202  
Reno, Nevada 89511  
(775) 687-2142 (phone)  
(775) 688-1822 (fax)  
shusbands@ag.nv.gov

11  
12  
13 Attorneys for State of Nevada ex. rel its  
14 Department of Taxation

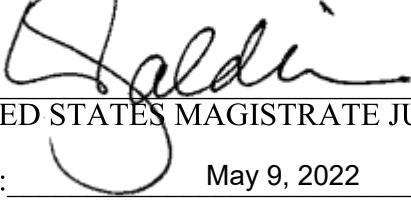
HKM EMPLOYMENT ATTORNEYS, LLP

By: /s/ Jenny L. Foley

JENNY L. FOLEY, Ph.D., Esq.  
Nevada Bar No. 9017  
101 Convention Center Dr., suite 600  
Las Vegas, Nevada 89109  
(702) 805-8340 (phone)  
(702) 805-8340 (fax)  
jfoley@hkm.com  
*Attorneys for Plaintiff*

15 **ORDER**

16 IT IS SO ORDERED.  
17

18   
UNITED STATES MAGISTRATE JUDGE

19 Dated: \_\_\_\_\_ May 9, 2022  
20

21  
22  
23  
24  
25  
26  
27  
28